Revised VOC RACT Rules Miscellaneous Metal and Plastic Parts and Products Coating Operations

The New Hampshire Department of Environmental Services, Air Resources Division recently revised Env-A 1200, *Volatile Organic Compounds (VOC) Reasonably Available Control Technology (RACT)*. These revisions change the applicability thresholds that affect the miscellaneous metal and plastic parts and products coating industries. This document can be used to help you determine if the revisions are applicable to your business, and if so, what your obligations are under this regulation.

The revised rule becomes effective January 1, 2016, and applies to a source whose miscellaneous metal and plastic parts and products coating operations have combined <u>actual</u> emissions of 3.0 tons of VOCs or more during any consecutive 12-month period.

Owners or operators of miscellaneous metal and plastic parts and products coating operations must control VOC emissions by using one or more of the following coating application methods:

- High volume-low pressure (HVLP)
- Electrostatic spray
- Zinc-arc spray
- Air-assisted airless spray
- Airless spray

- Flow coating technique
- Dip coat including electrodeposition
- Other method with a transfer efficiency equivalent or better than that achieved by HVLP spraying

Facilities subject to the rule must also implement work practice standards to control VOC emissions from VOC-containing coatings, thinners, cleaning and coatings-related waste material, such as:

- 1. Storing VOC-containing materials in closed containers, keeping mixing and storage containers closed at all times (except when adding or removing product);
- 2. Minimizing spills of VOC-containing materials; and
- 3. Conveying VOC-containing materials from one location to another in closed containers or pipes.

In addition, facilities are required to control their VOC emissions by using one of the following control options:

- 1. Use of low-VOC content coatings as applied;
- 2. Use of a combination of low-VOC content coatings and add-on controls; or
- 3. Use of add-on controls capable of achieving an overall VOC capture and control efficiency of 90 percent.

For more information:

Visit: www.des.nh.gov on the A to Z list "VOC RACT Rules" or

Call: 603-271-1370